

CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.
COUNSELLORS AT LAW

CHARLES C. CARELLA
BRENDAN T. BYRNE
PETER G. STEWART
JAN ALAN BRODY
JOHN M. AGNELLO
CHARLES M. CARELLA
JAMES E. CECCHI

JAMES D. CECCHI (1933-1995)
JOHN G. GILFILLAN III (1936-2008)
ELLIOT M. OLSTEIN (1939-2014)

JAMES T. BYERS
DONALD F. MICELI
A. RICHARD ROSS
CARL R. WOODWARD, III
MELISSA E. FLAX
DAVID G. GILFILLAN
G. GLENNON TROUBLEFIELD
BRIAN H. FENLON
LINDSEY H. TAYLOR
CAROLINE F. BARTLETT

5 BECKER FARM ROAD
ROSELAND, N.J. 07068-1739
PHONE (973) 994-1700
FAX (973) 994-1744
www.carellabyrne.com

RICHARD K. MATANLE, II
FRANCIS C. HAND
AVRAM S. EULE
RAYMOND W. FISHER
OF COUNSEL

RAYMOND J. LILLIE
WILLIAM SQUIRE
ALAN J. GRANT^{*}
STEPHEN R. DANEK
DONALD A. ECKLUND
MEGAN A. NATALE
AMANDA J. BARISICH
ZACHARY S. BOWER⁺
MICHAEL CROSS
CHRISTOPHER J. BUGGY
^MEMBER NY BAR ONLY
+MEMBER FL BAR ONLY

September 25, 2015

Via ECF and Federal Express

Honorable Jose L. Linares, U.S.D.J.
United States District Court
Martin Luther King Federal Building
50 Walnut Street
Newark, New Jersey 07102

Re: *DeFiesta v. Volkswagen Group of America*
Civil Action No. 15-7012 (JLL)(JAD)

Minkina v. Volkswagen Group of America
Civil Action 15-7020 (JLL)(JAD)

Ghezzi v. Volkswagen Group of America
Civil Action No. 15-7035 (JLL)(JAD)

Stein v. Volkswagen Group of America
Civil Action No. 15-7052(JLL)(JAD)

Williams and McGrath v. Volkswagen Group of America and Volkswagen AG
Civil Action No. 15-7053(JLL)(JAD)

Levin v. Volkswagen Group of America
Civil Action No. 15-6985 (JLL)(JAD)

Criston v. Volkswagen Group of America
Civil Action No. 15-6988(JLL)(JAD)

Dear Judge Linares:

This firm, along with others, represent Plaintiffs in numerous class actions now pending before Your Honor against Volkswagen Group of America, Inc. ("VW").

Your Honor has scheduled an in-person conference for this coming Tuesday, September 29 at 12:00 p.m. I am writing this letter with the consent of defense counsel to request a brief adjournment of the status conference from September 29 until October 20, if that date is

Honorable Jose L. Linares, U.S.D.J.
September 25, 2015
Page 2

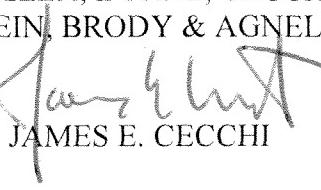
acceptable to Your Honor. During the period of the adjournment defense counsel will have an opportunity to consult with its client about the issues raised in our submission.

In addition, I have enclosed a form of Order which appoints Interim Co-Liaison Counsel which was one of the requests for relief sought in our Order To Show Cause. I am authorized to represent that defendant takes no position regarding this aspect of our application. In addition, as noted in our submission yesterday, I can also represent that all counsel who have filed cases in New Jersey support our Interim Co-Liaison appointment. We think it makes eminent sense here as it gives all counsel, the Court, and the defendant a single point of contact so that this important litigation in New Jersey can be efficiently and productively managed. We are hopeful that Your Honor agrees and both parties are in accord that the Application for an Order to Show Cause should be held in abeyance pending the status conference. Of course, should Your Honor have any questions regarding the Interim Liaison appointment or the requested adjournment of the status conference, we are available to speak at your convenience.

Thank you for Your Honor's attention.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO


JAMES E. CECCHI

cc: Honorable Joseph A. Dickson, U.S.M.J. (Via ECF and Federal Express)
All Counsel (via ECF)